

TUVΩΠΑΪΫΔΕΡVÖÖ
Kevin H. Sharp

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CURTIS L. CONROY,)
Plaintiff,)
v.) Case No. 3:10-cv-00605
DOLGENCORP, LLC,) Judge Sharp
Defendant.) Magistrate Judge Brown

**DEFENDANT DOLGENCORP, LLC'S EXPEDITED MOTION TO PLACE
DOCUMENTS FILED BY PLAINTIFF IN VIOLATION OF THE PROTECTIVE
ORDER UNDER SEAL**

On January 20, 2012, Plaintiff filed the documents identified below as a matter of public record in direct violation of the Agreed Protective Order entered by this Court on February 16, 2011 (Doc. No. 14). Pursuant to Paragraph 5 of the Protective Order, Plaintiff was required to file an accompanying "motion/written request that the materials be placed under seal" when filing these documents with the Court. Plaintiff did not do so and instead filed the documents as a matter of public record. Accordingly, Defendant requests that the following documents filed by Plaintiff be placed under seal:

Doc. No. 96-1, Three Progressive Counseling Records Issued to Non-Party Tom Crabtree (Ex. 5 to Deposition of Jason Helton): These confidential personnel records were part of the personnel file of a non-party. Pursuant to Paragraph 1 of the Protective Order, all personnel files are designated as "Confidential." Pursuant to Paragraph 2 of the Protective Order, documents containing "personal information of individuals not a party to this litigation"